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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LINDA PATTERSON,

Plaintiff,

v.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,

Defendant.

Case No. 2:18-cv-01951-APG-BNW

**JOINT STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME FOR
DEFENDANT TO RESPOND TO PLAINTIFF'S
MOTION FOR REMAND/REVERSAL**

(Second Request)

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Opening Brief be extended from May 15, 2019 to **June 19, 2019**. This is Defendant's second request for extension. Good cause exists to grant Defendant's request for extension. Counsel was out of the office last month attending prayer and funeral services following multiple family tragedies, including the death of her two cousins, and uncle. Counsel was also out of the office taking care of her elderly mother, who is scheduled for two surgeries this month. In addition, Counsel also has over 100+ active social security matters, which require two or more dispositive motions per week until mid-July. Due to heavy caseload and unexpected leave, Counsel

1 needs additional time to adequately review the transcript and properly respond to Plaintiff's Motion
2 for Reversal and/or Remand. The parties further stipulate that the Court's Scheduling Order shall be
3 modified accordingly. Defendant makes this request in good faith with no intention to unduly delay
4 the proceedings. Counsel apologizes for the belated request, but made her request as soon as
5 reasonably practicable, as she has been out on leave.
6

7 Respectfully submitted,

8 Dated: May 15, 2019

/s/ Cyrus Safa
(*as authorized by email on May 15, 2019)
CYRUS SAFA
Attorney for Plaintiff

12 Dated: May 15, 2019

NICHOLAS A. TRUTANICH
United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration

16 By /s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant U.S. Attorney
Attorneys for Defendant

19 **ORDER**

20 APPROVED AND SO ORDERED:

21 DATED: May 17, 2019

22 Brenda Weksler
THE HONORABLE BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**

2 I, TINA L. NAICKER, certify that the following individual was served with a copy of the
3 **JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME FOR**
4 **DEFENDANT TO RESPOND TO PLAINTIFF'S MOTION FOR REMAND/REVERSAL** on
5 the date and via the method of service identified below:

6 **CM/ECF:**

7
8 Cyrus Safa
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23 Attorneys for Plaintiff

24
25 Respectfully submitted this 15th day of May 2019,

26
/s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant United States Attorney